

FC-CIC-19ALG 27M1129

Case No. 2019 DRB 3033

2. Defendant is an adult citizen of the United States and is a *bona fide* resident of the District of Columbia.

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3. The Parties have been living together as a family since January 2006 and were married on June 21, 2012 in the District of Columbia.

4. The Parties have a thirteen year old son, [REDACTED], born [REDACTED]. He is in the primary custody of his mother, who is a fit and proper person to have custody.

5. The parties physically separated on or about April 7, 2019 when Defendant told Plaintiff that he was romantically involved with and in love with another woman, Ilhan Omar, who serves as a U.S. Representative from Minnesota (hereafter Rep. Omar). Defendant met Rep. Omar while working for her. Although devastated by the betrayal and deceit that preceded his abrupt declaration, Plaintiff told Defendant that she loved him and was willing to fight for the marriage. Defendant, however, told her that was not an option for him. He provided no other explanation for his sudden change of heart nor had he discussed being unhappy with their marriage. Defendant then physically moved from the marital home on April 8, 2019.

6. It is clear to Plaintiff that her marriage to Defendant is over and that there is no hope of reconciliation. Accordingly, the separation is now mutual and voluntary.

7. As required by D.C. Code § 16-4602.9(a) (2006 Repl.), Plaintiff states the following:

(1) Plaintiff has not participated, as a party or witness or in any other capacity, in any other proceeding concerning the custody of or visitation with the minor child.

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(2) Plaintiff knows of no other proceeding that could affect the current proceeding, including proceedings for enforcement and proceedings relating to domestic violence, protective orders, termination of parental rights, or adoptions.

(3) Plaintiff knows of no other person not a party to this proceeding who has physical custody of the children or claims rights of legal custody or physical custody, or visitation with the minor child.

(4) Plaintiff and the minor child continue to reside in the marital residence located at [REDACTED]. Since the Parties' separation, the minor child had spent some time with Defendant at [REDACTED].

8. Plaintiff is and has always been the primary caregiver to the parties' son and is intimately involved in every aspect of their son's life. As between the parties, Plaintiff is the parent who has historically been responsible for the child's day-to-day care and for payment of and handling the vast majority of responsibilities related to his school, medical care, and extracurricular activities.

9. In contrast, Defendant's involvement with the minor child has been sporadic due to his extensive travel and long work hours (on reflection, Defendant's more recent travel and long work hours now appear to be more related to his affair with Rep. Omar than with his actual work commitments, averaging 12 days per month away from home over the past year). More recently, even when Defendant was not traveling and was home with the family, he was preoccupied and emotionally volatile.

10. Plaintiff has significant reservations about Defendant's judgment and ability to care for their son on a consistent basis. By way of example, days

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prior to Defendant's devastating and shocking declaration of love for Rep. Omar and his admission of their affair, he and Rep. Omar took the parties' son to dinner to formally meet for the first time at the family's favorite neighborhood restaurant while Plaintiff was out of town. Rep. Omar gave the parties' son a gift and the Defendant later brought her back inside the family's home. The following evening, again while Plaintiff was away, Defendant told [REDACTED] he was going to an event with Rep. Omar and, upon information and belief, never came home that night.

11. Defendant's lack of judgment is troubling on many levels. Most concerning is that Defendant put his son in harm's way by taking him out in public with Rep. Omar who at that time had garnered a plethora of media attention along with death threats, one rising to the level of arresting the known would be assassin that same week.

12. Defendant has a history of emotional volatility, that can cause him to become easily angered and rageful, making it difficult to live with him at times. In contrast, Defendant has described Plaintiff as "stable and trustworthy."

13. It is in the minor child's best interest to remain in his mother's primary custody and care. Plaintiff has a very close and loving relationship with her son, and she is a fit and proper person to have primary custody of

[REDACTED]. Defendant should have reasonable access to the parties' son, taking into consideration [REDACTED] safety and best interests.

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14. Plaintiff is 55 years old and is employed as the Medical Director and Health Services Administrator of the D.C. Department of Corrections. Defendant is 38 years old and is a political strategist and Partner at E Street Group Consulting, a successful political consulting firm he recently founded. Upon information and belief, Defendant's current income is comparable to Plaintiff's income, with a strong potential for much higher earnings in the very near future (2020). Defendant is well able to contribute to the support of his minor son.

15. Plaintiff has been a devoted and loving partner and wife to Defendant throughout the parties' fourteen-year relationship. She has been unwavering in her support of Defendant's career and his recent efforts to launch his business, E Street Group Consulting; Defendant recently acknowledged to others that Plaintiff has "given me everything I needed to succeed." Defendant is choosing to end the marriage at a time when he is poised to enter his highest earning years, and to abandon his wife, who is much closer to the end of her professional career and is left to face a financially insecure future as a result of Defendant's unilateral decision.

16. The Parties acquired their family home together in 2006, prior to their marriage. Plaintiff used her funds for the closing costs to purchase the home. It was also her income which paid the majority of the mortgage and maintenance and renovation costs, the latter of which Defendant has refused to fully contribute to, despite his promises to the contrary. Defendant's

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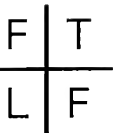
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actions have created financial uncertainty for Plaintiff and she should be awarded the home, and all of the equity therein.

17. During the marriage the Parties acquired various tangible and intangible property, including bank and cash accounts, retirement assets, automobiles, furniture, furnishings, which are all marital assets subject to equitable division by this Court. Plaintiff was the primary breadwinner for the family during the majority of the Parties' years together. Plaintiff made very substantial monetary contributions to the acquisition, preservation, and appreciation in value of the Parties' estate.

18. Defendant was able to develop a successful career and high earning potential during the parties' long-term relationship. From the very beginning of their relationship until just before he left the marital home, Defendant took advantage of Plaintiff's network of professional and personal contacts to help launch and grow his career as a political consultant. His ability to pursue his professional ambitions was only possible because of Plaintiff's unconditional willingness to assume the lion's share of financial and day to day responsibilities for the parties' son and the family household (in addition to her role as the primary earner for the family).

19. Plaintiff worked arduously before filing this Complaint to try to achieve an amicable settlement with her husband. Defendant refused, and instead threatened to malign her and ruin her career if she sought assistance of the Court. In the face of the Plaintiff's difficult decision to seek assistance



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from the Court, Defendant has also begun threatening not to pay for his share of their joint financial responsibilities, conveniently asserting after their separation that he is nearly broke, and his business is floundering.

Defendant's bullying tactics are disappointing, but not surprising.

20. In deciding the equities of this case, the Court should take into consideration Plaintiff's very significant non-monetary contributions to Defendant's career success and the well-being of the family unit.

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Grant Plaintiff a legal separation from Defendant on the ground of a mutual and voluntary separation without cohabitation;
2. Award the Parties joint legal custody of the minor child;
3. Award Plaintiff primary physical custody of the minor child, with liberal access to Defendant;
4. Establish an access schedule in the best interest and safety of the minor child;
5. Order Defendant to contribute towards the support of the minor child in accordance with the best interests of the child and prior family experience and commensurate with the proportion of time that [REDACTED] is in each parent's care;
6. Award Plaintiff her sole and separate property;
7. Award Plaintiff the marital home (and take into consideration that Defendant owes Plaintiff money for agreed-to renovation costs);

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8. Identify, value, and equitably distribute the parties' marital property after full consideration of all relevant statutory factors, giving particular weight to Plaintiff's substantial contributions to the acquisition and appreciation in value of such property;

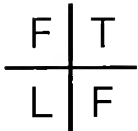
9. Award Plaintiff her reasonable attorneys' fees and costs incurred in connection with this action;

10. Grant such other and further relief as the nature of this case requires.

Respectfully submitted,



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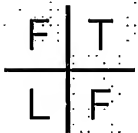
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I DO SOLEMNLY SWEAR AND AFFIRM UNDER PENALTY OF PERJURY THAT THE CONTENTS OF THE FOREGOING COMPLAINT FOR LEGAL SEPARATION, CUSTODY, CHILD SUPPORT, EQUITABLE DISTRIBUTION OF PROPERTY, AND OTHER RELATED RELIEF ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF

Beth Mynett

BETH MYNETT



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